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9 Attorneys for Plaintiffs

9 | Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

12 MARK AARON HAYNIE, BRENDAN
13 JOHN RICHARDS, THE CALGUNS
14 FOUNDATION, INC., and THE
SECOND AMENDMENT
FOUNDATION, INC..

Plaintiffs.

vs.

18 KAMALA HARRIS, Attorney General
of California, CALIFORNIA
19 DEPARTMENT OF JUSTICE, CITY
OF ROHNERT PARK, and OFFICER
20 DEAN BECKER (RP134)

Defendants.

Case No.: 3:10-CV-01255 SI

**STIPULATION and JOINT
ADMINISTRATIVE MOTION and
PROPOSED ORDER
Re: Case Management**

CURRENT CMC: SEPTEMBER 6, 2013

PROPOSED CMC: JANUARY 10, 2014

IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys of record that the pending Case Management Conference currently set for September 6, 2013 in Courtroom 10, 19th Floor of the U.S. District Court for the Northern District of California should be reset.

27 The Rohnert Park Defendants and the Plaintiffs are still engaged in earnest
28 self-directed settlement discussions.

1 If a settlement can be reached, then the remaining parties (California
2 Department of Justice and the Plaintiffs) will proceed with setting hearing dates for
3 dispositive motions at the next Case Management Conference.

4 Furthermore, the Plaintiffs and the California Department of Justice are
5 aware that several bill have been introduced in the State Legislature that may
6 moot this case or require amendments to the pleadings. Several of those bills have
7 passed at least one legislative house and are pending in the other. Those parties
8 may seek another continuance and/or stay to conserve resources of the parties and
9 the Court.

10 The parties propose that the Court reset the Case Management Conference to
11 January 10, 2014 in order to give the parties engaged in settlement discussions the
12 time necessary to conclude that process or to request formal ADR assistance from
13 the Court.

14 **SO STIPULATED.**

15 Date: August 28, 2013

Date: August 28, 2013

16 /s/
17 Ross Moody, Deputy Attorney General
Counsel for Defendants
Harris & California Dept. of Justice

/s/
Donald Kilmer,
Counsel for Plaintiffs

18 Date: August 28, 2013

19 /s/
20 Robert W. Henkels
Counsel for Defendants
City of Rohnert Park & Becker

22 **ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND
23 LOCAL RULE VIII.B.**

24 I, Donald Kilmer, declare under penalty of perjury under the laws of California
and the United States that I have in my possession e-mail correspondence from
25 Ross Moody, and Robert Henkels that the content of this document is acceptable to
all persons required to sign the document. I declare that this document was signed
26 in San Jose, CA on August 28, 2013

27 /s/
28 Donald Kilmer, Attorney for Plaintiffs

ORDER

The Case Management Conference currently set for September 6, 2013 is
reset to: (Date) _____, at (Time): _____, in
Courtroom 10, 19th Floor of the U.S. District Court for the Northern District of
California – San Francisco. A Joint Case Management Conference Statement shall
be filed seven (7) calendar days before the new date.

7 | Date:

United States District Judge